

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

JMK 271 Cadman Plaza East F.#2009R00579 Brooklyn, New York 11201

May 4, 2012

## By ECF and Federal Express

Howard Jacobs, Esq. Richard Jasper, Esq. 401 Broadway, Suite 1902 276 Fifth Avenue, Suite 501 New York, New York 10001

Re: United States v. John Burke

Criminal Docket No. 09-135 (S-7) (SJ)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

The government renews its request that the defendants provide reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure.

## Documents and Objects

| вох | TYPE           | DESCRIPTION   |
|-----|----------------|---|
| 99  | Photograph     | Photograph of Daniel Zahn                             |
| 99  | Photograph     | Photograph of Bruce Gotterup                          |
| 99  | Photograph     | Social photographs of Peter Zuccaro                   |
| 99  | Photograph     | Photographs of John Gebert                            |
| 100 | Prison Records | State prison records of John Burke (1982-2000)        |
| 100 | Prison Records | State prison records of Robert<br>Greco (1982-1984)   |
| 100 | Prison Records | State prison records of Steven<br>Zuccaro (1984-1985) |
| 100 | Prison Records | State prison records of Steven<br>Zuccaro (1987-1991) |

Very truly yours,

LORETTA E. LYNCH United States Attorney 2

By: /s/

Jacquelyn M. Kasulis

Evan M. Norris Whitman G.S. Knapp

Assistant U.S. Attorneys (718) 254-6103/6376/6107

cc: Clerk of Court (SJ) (without enclosures) (by ECF)